BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY DOCKET NO. R2000-1

FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS PAFFORD (UPS/USPS-T4-14) (April 5, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves this follow-up interrogatory directed to United States Postal Service witness Pafford: UPS/USPS-T4-14.

Respectfully submitted,

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Attorneys for United Parcel Service

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Of Counsel.

FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS PAFFORD

UPS/USPS-T4-14. Refer to your answer to UPS/USPS-T4-11(b)(i). In certain sections of the SAS code in LR-I-30 to which you there refer (see, for example, file APPENDXE.TXT), certain adjustment factors appear to have been replaced with "XXX." For example:

IF MAIL TYP='PI-FC-PRESORT' THEN DO;

REVENUE=(REVENUE*X.XXXXXXXX); PIECES=(PIECES*X.XXXXXXXX); *FIRST CLASS PERMIT IMPRINT PRESORT; WEIGHT=(WEIGHT*X.XXXXXXXX); END;

Furthermore, sections of the code have been "commented out" (e.g., surrounded by "/*" and "*/" marks) in LR-I-30.

- (a) Confirm that the SAS code filed in LR-I-30 is the complete, unaltered code as run by the Postal Service. If not confirmed, explain in full
- (b) If sections of the SAS code in LR-I-30 have been commented out, please provide the full, unaltered SAS code, including but not limited to all relevant and necessary adjustment factors.
- (c) Confirm that sections of the SAS code in LR-I-30 have been "commented out" (e.g., altered so as not to be submitted in the course of the program). If not confirmed, explain in full. If confirmed, explain why these sections are so altered, what led the programming to be changed, and what effect these sections of the code have on the program running and results.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

William ปี. Pinamont

Attorney for United Parcel Service

Dated: April 5, 2000 Philadelphia, Pa.

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